

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

FILED
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U.S. DISTRICT COURT
DISTRICT OF MASS.

UNITED STATES OF AMERICA,)
Plaintiff)
v.)
ROMAN ZHIRNOV,)
Defendant)

CRIMINAL INDICTMENTS
NO. 02-30043-MAP

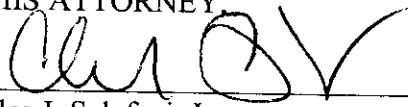
DEFENDANT'S MOTION TO CONTINUE MOTION HEARING DATE

Now comes the Defendant, Roman Zhirnov, by his attorney in regard to the above-entitled action and respectfully requests that the Motion to Suppress Hearing scheduled for hearing on April 27, 2005 at 2:00 p.m. be continued to May 10, 2005, May 11, 2005, May 12, 2005 or to such other future time that may be convenient with the Court. The reasons for this motion are as follows:

1. The undersigned attorney for the Defendant has a conflict, as he is scheduled to be at the United States District Court in Boston on April 27, 2005 at 2:00 p.m. before Judge Gorton in the case of United States v. Joyce Greene, Dkt No. 03-40028 for a sentencing hearing;
2. Attorney for the co-defendant Aleksy Safanov is also unavailable on April 27, 2005;
3. Attorney Black's office indicated that May 10, 2005, May 11, 2005 and May 12, 2005 were all dates that Attorney Black is also available.
4. Assistant United States District Attorney Kevin O'Regan is aware of this conflict and is aware of the filing of this Motion to request a continuance.

Wherefore, Defendant requests that his Motion to Continue be granted.

THE DEFENDANT,
BY HIS ATTORNEY




Charles J. Sclafani, Jr.
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CERTIFICATE OF SERVICE

I, Charles J. Sclafani, Jr., attorney for the Defendant, Roman Zhirnov, hereby certify that on this 21st day of April, 2005, I served a copy of the foregoing *DEFENDANT'S MOTION TO CONTINUE MOTION HEARING DATE* by in hand delivery to the Assistant U.S. Attorney, Kevin O'Regan, Federal Building & Courthouse, 1550 Main Street, Springfield, MA 01103 and by facsimile on this 21st day of April 2005.



Charles J. Sclafani, Jr.